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April 11, 2006

**BY HAND DELIVERY**

Clerk of the Court  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Burnett, et al. v. Al Baraka Inv. & Dev., et al.; Case No. 03-CV-9849

Dear Clerk of the Court:

On behalf of Sheikh Abdullah Bin Khalid Al-Thani ("Sheikh Abdullah"), I write in response to the April 10, 2006 letter of Robert T. Haeefe, plaintiffs' counsel in the above-referenced matter. In that letter, and in response to my April 7, 2006 letter opposing the Burnett plaintiffs' request for entry of default as against Sheikh Abdullah, Mr. Haeefe claims that Sheikh Abdullah is now a defendant in the Burnett action, that he was served via publication, and that default as to him is proper because he has not responded to the complaint.

With due respect to plaintiffs' counsel, plaintiffs in this action did not effectively add Sheikh Abdullah as a defendant, and the default against him therefore was improvidently and improperly entered. Indeed, because the Burnett plaintiffs did not comply with relevant provisions of either Judge Robertson's or Judge Casey's case management orders ("CMOs"), even if Sheikh Abdullah had been properly served in the related September 11 cases (which he was not), and even if his representatives had been monitoring the MDL docket, he would not have had adequate notice that the Burnett plaintiffs had purported to add him as a party.

As we understand the last sentence of paragraph 4 of Judge Robertson's CMO No. 1 (attachment A hereto), plaintiffs were required to amend the caption of the Burnett action to include any defendant they purported to have added and served. No such amendment was made. In addition, in contravention of paragraph 13 of Judge Casey's CMO No. 2 (attachment B hereto), the Burnett plaintiffs did not file an amended complaint that included all amendments to date, or otherwise add Sheikh Abdullah to the caption, on or before September 30, 2005.<sup>1</sup>

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<sup>1</sup> CMO No. 2's original July 31, 2005 deadline was extended to September 30, 2005 pursuant to a July 27, 2005 Endorsed Letter from Sean P. Carter. (See 03 MDL 1570, Docket # 1075.) The Notice of Consolidation of

*(Footnote continued to next page)*

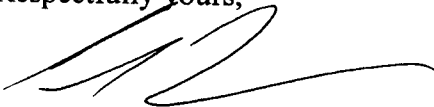
**DLA PIPER RUDNICK  
GRAYCARY**

Clerk of the Court  
United States District Court  
Southern District of New York  
April 11, 2006  
Page 2

These are not technical arguments, but matters of basic notice and fairness before a default should be entered in any circumstance, let alone against the Minister of the Interior of a sovereign state, as Sheikh Abdullah is of Qatar. As a result of plaintiffs' noncompliance with prior CMOs, the Court's docket entries did not reveal that plaintiffs had purported to add Sheikh Abdullah in the Burnett action; the only way his representatives would have known is if they had scanned multiple lengthy dockets and opened every filing that added additional parties. Wholly apart from Sheikh Abdullah's position that service by publication as to him has not been properly made – an issue we have briefed in Sheikh Abdullah's motion to dismiss the related actions of Euro Brokers, Inc., et al. v. Al Baraka Inv. and Dev. Corp., et al., Case No. 04-CV-7279, New York Marine and Gen. Ins. Co. v. Al Qaida, et al., Case No. 04-CV-6105, and World Trade Ctr. Props. LLC, et al. v. Al Baraka Inv. and Dev. Corp., et al., Case No. 04-CV-7280 – a default should not have been entered against Sheikh Abdullah when he did not have adequate notice that he might be deemed a party to the Burnett litigation.

As directed by Chambers, we have asked Mr. Haefele whether plaintiffs would voluntarily vacate the default entered against Sheikh Abdullah in Burnett. Mr. Haefele is traveling today, and although he was kind enough to respond by email, he does not consent to vacate. We therefore will await further directions from the Court, and we are prepared to move to vacate on short notice.

Respectfully yours,



David E. Nachman

Attachments

cc (via facsimile):

The Honorable Richard C. Casey  
Robert T. Haefele, Esq.

---

*(Footnote continued from previous page)*

Pleadings filed by the Burnett plaintiffs on September 30, 2005 (see 03 MDL 1570, Docket # 1377) did not comply with paragraph 13 of this Court's CMO No. 2, as that approach defeated the "clear objective" – as articulated by plaintiffs in Mr. Carter's July 27, 2005 letter – of "ensur[ing] that any and all additional allegations contained in More Definite Statements or other filings ultimately would be incorporated into a single pleading in each of the cases." (See 03 MDL 1570, Docket # 1075.)

# **Attachment A**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

THOMAS BURNETT, SR., et al., :  
 :  
 Plaintiffs, :  
 :  
 v. : Civil Action No. 02-1616 (JR)  
 :  
 AL BARAKA INVESTMENT AND :  
 DEVELOPMENT CORPORATION, et al., :  
 :  
 Defendants. :

CASE MANAGEMENT ORDER NO. 1

1. Plaintiffs' Second Amended Complaint, which was lodged with the clerk on September 10, 2002, is deemed to have been filed on that date. The Second Amended Complaint will remain on file with the court in the form in which it was lodged (CD-ROM) but will not be electronically filed.

2. Plaintiffs may have leave to file a Third Amended Complaint no later than October 25, 2002. In the Third Amended Complaint, each named plaintiff and each defendant shall be assigned a number (P1, P2, etc.; D1, D2, etc.). Unnamed or John Doe parties shall be designated "Additional plaintiffs \_\_\_\_ - \_\_\_\_" and "Additional defendants \_\_\_\_ - \_\_\_\_," using the highest number of plaintiffs and defendants that counsel expect to name.

3. Subsequent to the filing of the Third Amended Complaint, plaintiffs may without further leave of court add or remove parties by listing their names (and numbers) and filing the lists as supplemental pleadings under Rule 15(d). Leave of

court must be sought before making any other changes to the pleadings, whether by amendment or by supplementation.

4. The caption in the court's docket will not be changed to reflect the names of parties added by the Second or Third Amended Complaints or by any subsequent amendments to or supplementation of the pleadings, nor will the names of added or withdrawn parties be listed in docket entries, except that each additional defendant will be listed upon the issuance of summons for that defendant.

5. Motions for leave to appear pro hac vice will be granted only upon condition that the lawyer admitted, or at least one member of the lawyer's firm, undergo CM/ECF training, obtain a CM/ECF username and password, and agree to file papers electronically. No court papers will be mailed to any lawyer.

JAMES ROBERTSON  
United States District Judge

# **Attachment B**

United States District Court  
Southern District of New York

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6-16-04

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)  
ECF Case

Case Management Order #2

*This document relates to: All actions*

**Richard Conway Casey, United States District Court Judge:**

If this Court so directs, Plaintiffs consent to proceed before a United States Magistrate for pre-trial purposes, pursuant to 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73.

Yes \_\_\_\_\_ X \_\_\_\_\_

No \_\_\_\_\_

Counsel for the parties have discussed the merits of settlement in regard to this action and wish to request a settlement conference before a United States Magistrate.

Yes \_\_\_\_\_

No \_\_\_\_\_ X \_\_\_\_\_

Counsel for the parties have discussed the merits of mediation in regard to this action and wish to employ the mediation services provided by this Court.

Yes \_\_\_\_\_

No \_\_\_\_\_ X \_\_\_\_\_

#### **Consolidation**

1. The actions listed in Schedule A have been transferred to this Court pursuant to 28 U.S.C. § 1407 for coordinated or consolidated pretrial purposes by the Judicial Panel on Multidistrict Litigation. All such actions are hereby consolidated for pretrial purposes pursuant to the provisions of Rule 42 of the Federal Rules of Civil Procedure under the docket number MDL 1570 (the "Consolidated Action"). All references to consolidation in this Order shall refer to consolidation for pretrial purposes pursuant to 28 U.S.C. § 1407. This Order does not constitute a determination that the



Individual Actions should be consolidated for trial, nor does it have the effect of making any entity a party to an action in which it has not been joined and served in accordance with the Federal Rules of Civil Procedure.

2. Additional actions transferred and consolidated with MDL 1570 as "tag-along actions" pursuant to Rules 7.4 and 7.5 of the Rules of Procedure of the Judicial Panel on Multi-District Litigation or designated as "related actions" under the Local Rules of the Southern District of New York (together, "Related Cases") shall be subject to the provisions of this Order.

3. A Master File, and a Master Docket for that file, are hereby established for these consolidated proceedings. The original of this Order shall be filed by the Clerk in the Master File. The Clerk of the Court shall file all orders, pleadings, motions, and other documents bearing the Docket Number MDL 1570 in the Master File and shall note such filing in the Master Docket. No further copies need be filed or docket entries made, except as provided in Paragraph 5.

4. The Clerk has assigned, or shall assign, a separate docket number (an "S.D.N.Y. Docket Number") and shall maintain a separate file for each of the actions on Schedule A and each Related Case (the "Individual Actions"). A copy of this Order shall be placed in each such separate file. No further filings need be made in the separate files, except as provided in Paragraph 5. All orders, pleadings, motions, and other documents filed in the Master File will be deemed filed and entered in each individual action to the extent applicable. The Clerk shall ensure that this Order is docketed electronically and distributed through the Electronic Case Filing system.

5. Documents intended to apply only to a particular Individual Action or Actions will, as described in Paragraph 6 below, indicate in their caption the S.D.N.Y. Docket Number(s) of the Individual Action(s) to which they apply. Such documents will be filed and docketed both in the Master File and the separate file(s) for the specified Individual Action(s), in accordance with the Electronic Case Filing system procedures established by the Clerk's Office.

**Captions**

6. Every paper filed in the Consolidated Action shall have the following caption:

<b>United States District Court Southern District of New York</b>  In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
--	-------------------------------

This document relates to: All actions

7. When a paper is intended to be applicable to all of the Individual Actions, the words "All Actions" shall appear after the words "This Document Relates To:" in the caption set forth above and only the Master Docket number will be identified.

8. When a paper is intended to be applicable to some, but not all, of the Individual Actions, the S.D.N.Y. Docket Number for each Individual Action to which the paper applies and the full names of the first plaintiff and first defendant in that action shall appear immediately after the words "This Document Relates To:" in the caption set forth above.

**Filings and Service of Papers**

9. Pursuant to paragraph 1 of this Court's Case Management Order No. 1, all attorneys who have made appearances in this case must register with the Court's CM/ECF system. Counsel may not opt out of email service for non-court documents. All written communication with the Court of any type or kind whatsoever shall be served on all counsel of record in all the Individual Actions, regardless of which or how many Individual Actions such communication relates to. Service shall be accomplished as follows:

(a) For all documents filed through the ECF system, service shall be deemed complete upon electronic filing through the ECF system and no further service need be made. If at least one member of a law firm representing a party has registered for electronic service through the ECF system, a party filing a document in the ECF system need not serve by mail or other means other attorneys in the same firm, even if the other attorneys' names appear as not having been served electronically through the ECF system.

(b) For documents that are not filed through the ECF system but that nonetheless are required to be served, service shall be by e-mail and shall be necessary only upon those attorneys listed with e-mail contact information in Schedule B. Attorneys who subsequently consent to be served by e-mail shall so notify the Court in writing and provide e-mail contact information to Kreindler & Kreindler.

10. Where voluminous documents that are required to be filed through the ECF format do not exist in electronic format and it would be burdensome to convert them, hard copies may be served by hand, by express courier service, or by mail. Service

of hard copies shall be deemed complete upon hand-delivery or upon delivery to the United States Postal Service or an express courier service.

11. **Service Cut-Off Date:** Service of the summons and complaint on a defendant not located in a foreign country shall be made in accordance with Federal Rule of Civil Procedure 4(m). Service of the summons and complaint upon a defendant located in a foreign country who has been named as of the date of this order shall be made by October 15, 2004, or, if a motion to effect service through alternative means has been filed with respect to that defendant, service shall be made within 90 days of a decision by this Court on the motion. Any defendant located in a foreign country who is named after the date of this order shall be served within 120 days after being so named, or, if a motion for alternative service is filed in connection with that defendant, within 90 days of a decision on such a motion. A motion for alternative service shall be filed within 60 days of the date on which the defendant has been named. The Court, upon motion or on its own initiative after notice to the plaintiffs, may dismiss the action without prejudice as to any defendant who has not been served or, provided that the plaintiffs show good cause for the failure to serve, the Court may extend the time for service for an appropriate period.

### **Pleadings and Parties**

12. **Addition of Parties:** Joinder of additional parties must be accomplished by December 31, 2004. Plaintiffs may without further leave of court add or remove parties by listing their names and filing the lists as supplemental pleadings under F.R.C.P. 15(d). The caption in the docket for the Individual Action to which a plaintiff or defendant has been added or removed will be changed to reflect the names of the parties in the Individual Actions as amended by the filing. Plaintiffs added by this procedure need not re-serve defendants who have already been served. Any defendant added by this procedure may, in lieu of any other answer or response to the complaint, and within the same time period allowed for such other answer or response, request, by motion or otherwise, a more definite statement pursuant to F.R.C.P. 12(e). Such request for a more definite statement shall not operate as a waiver of any defenses or objections, including objections based on lack of jurisdiction or improper service. When a defendant as to whom no allegations have been asserted requests a more definite statement pursuant to the procedures set forth herein, plaintiffs shall file the requested statement within 30 days. Rule 12(e) statements filed pursuant to this procedure may be filed as an independent pleading and no Amended Complaint need be filed. The filing of such a more definite statement will be deemed an amendment to plaintiffs' Complaint or Amended Complaint, by incorporation by reference. When a defendant requests a more definite statement pursuant to this procedure, the time for such defendant to answer, move, or otherwise respond to the Complaint shall run from service of the statement so requested.

13. **Amendments:** Amended pleadings may be filed until July 31, 2005, after which any amendments must be approved by the Court, pursuant to Federal Rule of Civile Procedure 15(a). Plaintiffs may file more definite statements and/or additional allegations against existing defendants by filing statements to this effect, which will be treated and accepted as pleadings and deemed amendments to previously-filed Complaints or Amended Complaints, in lieu of filing an additional Amended Complaint. On July 31, 2005, the plaintiffs shall file an amended complaint that includes all amendments made prior to that date, whether made pursuant to Rule 12(e) or otherwise.

14. **RICO Statements:** As to all defendants on behalf of whom counsel have entered an appearance in the Federal Insurance action as of the date of this Order, the Federal Insurance plaintiffs shall file a RICO Statement, in the form set forth in this Court's "Instructions for filing RICO Statement," available on the Internet at:

[www.nysd.uscourts.gov/judges/usdj/casey.htm](http://www.nysd.uscourts.gov/judges/usdj/casey.htm)

within thirty (30) days of the date of this Order. As to all other defendants named in the Federal Insurance action, the Federal Insurance plaintiffs shall file a RICO Statement within thirty (30) days of the filing of an entry of appearance by counsel on behalf of any such defendant in the Federal Insurance action. Any such RICO Statement shall be deemed an amendment to the Federal Insurance plaintiffs' Complaint or Amended Complaint, by incorporation by reference.

#### **Discovery**

15. All discovery responses already served by defendants in the *Burnett* action shall be deemed part of the Consolidated Action. Discovery requests already served in the *Burnett* action to which responses have not yet been served need not be re-served, except that copies of all such requests shall be provided to the Plaintiffs' Executive Committee(s) and to counsel for any party to whom such requests pertain if such counsel has not already been served.

16. Any party may seek the assistance of the Court in obtaining documents from non-party foreign governments or officials through a "letters rogatory" process or otherwise. Any party seeking such assistance shall notify all other parties and all parties together shall submit an agreed form of requests to be sent to the foreign government or official. To the extent that any party sends a representative to personally retrieve documents provided in response to a request from this Court to a foreign government or official, plaintiffs (collectively) and defendants (collectively) shall be entitled to send the same number of representatives. All documents so retrieved shall be deposited with the Court and shall be made available to all parties. The parties shall make such application to this Court as may be necessary to effectuate this provision.

17. Fact Discovery: Written discovery and depositions addressed to non-parties and to or from any defendant that has filed an Answer in any of the Individual Actions as to liability issues only may commence immediately. As to any defendant that has filed a motion to dismiss on grounds of immunity from suit (based on the Foreign Sovereign Immunities Act or diplomatic immunity) or for lack of personal jurisdiction, merits discovery shall not take place until such jurisdictional motion has been resolved by this Court, except upon application to the Court based on extenuating circumstances.

Depositions may proceed concurrently with written discovery. No depositions shall be extended beyond two business days without prior leave of the Court. A party may take a deposition by videotape by so indicating in its Notice of Deposition or by providing written notice that the deposition will be videotaped no less than 10 days before the deposition. Objections to the videotaping of a deposition must be filed and served within 5 days after notice of videotaping is served. Unless the Court has ruled to the contrary prior to the deposition, the deposition may be videotaped. Fact discovery shall be completed by December 31, 2005.

18. Expert discovery: Experts are to be designated and their expert reports exchanged by February 15, 2006. Expert depositions shall commence after February 15, 2006 and shall be completed by April 15, 2006.

19. All liability discovery is to be completed by April 15, 2006.

20. To the extent possible, the parties shall conduct consolidated discovery and all discovery notices served and all responses to all discovery requests in an Individual Action shall be deemed to be part of the Consolidated Action and each Individual Action.

21. Interim deadlines may be extended by the parties on consent without application to the Court, provided the parties are certain they can still meet the discovery completion date ordered by the Court, which shall not be adjourned except upon approval by the Court.

22. Document Translation: A party producing documents in a language other than English shall produce existing translations of those documents; however, translations produced by or for a party's attorney need not be produced.



**Dispositive Motions**

23. All motions and applications shall be governed by the Court's Individual Rules of Practice.

24. A pre-motion conference will be required before any dispositive motion is filed, except motions to dismiss. The Court will confirm the parties' briefing schedule at the pre-motion conference. After the papers are fully submitted, the parties will be informed whether oral arguments are required. With respect to motions to dismiss, the Defendants (or the parties, to the extent they agree) will submit a proposed briefing and oral argument schedule to the Court in advance of the next Case Management Conference.

25. With respect to motions to dismiss, the parties shall submit to the Court an agreed-upon, proposed briefing schedule.

26. With respect to motions to dismiss in the Federal Insurance matter, defendants who have been served on or before March 10, 2004 shall file their motions to dismiss in accordance with any stipulations approved by the Court or such other schedule as the Court may order; opposing papers shall be filed within 60 days of the filing of any such papers and reply papers shall be filed within 14 days after receipt of opposing papers.

27. No summary judgment motion will be heard before the close of discovery.

**Admission of Attorneys and Admissions**

28. In accordance with Rule 1.4 of the Rules Procedure of the Judicial Panel on Multidistrict Litigation, any attorney of record in any of the Individual Actions may continue to represent his or her client in this Court in this action. Such attorneys shall be deemed admitted *pro hac vice* for purposes of the Consolidated Action and need not obtain local counsel.

**Case Management Conferences**

29. The next Case Management Conference shall take place on September 13, 2004. Plaintiffs' Liaison Counsel and defendants' counsel shall confer at least five (5) business days in advance of each scheduled Case Management Conference for the purpose of attempting to narrow and agree upon issues to be discussed at the conference and for the further purpose of preparing and submitting to the Court an agreed-upon Case Management Conference agenda, including a schedule of motions that are ready to be heard. Such agenda shall be submitted to the Court at least three (3) business days in advance of the Case Management conference and, to the extent reasonable, the parties shall be limited to discussion of the matters on the agenda. To the extent that the parties are unable to agree upon a joint agenda, separate proposed agendas may be submitted.

So Ordered.



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Richard Conway Casco, U.S.D.J.

June <sup>15</sup>, 2004  
New York, New York

Schedule A – Individual Actions Consolidated in MDL 1570

-----X

THOMAS BURNETT, SR., et al.,

Plaintiffs,

Civ. Action No. 03 CV 9849 (RCC)

- against -

AL BARAKA INVESTMENT &  
DEVELOPMENT CORP., et al.,

Defendants.

-----X

KATHLEEN ASHTON, et al.,

Civ. Action No. 02 CV 6977 (RCC)

Plaintiffs,

- against -

AL QAEDA ISLAMIC ARMY, et al.,

Defendants.

-----X

FIONA HAVLISH, et al.,

Plaintiffs,

Civ. Action No. 03 CV 9848 (RCC)

- against -

SHEIKH USAMA BIN-LADEN, et al.,

Defendants.

-----X

WALTER TREMSKY, et al.

Plaintiffs,

Civ. Action No. 02 CV 7300 (RCC)

- against -

OSAMA BIN LADEN, et al.,

Defendants.

-----X

-----X

GLADYS SALVO, et al.

Plaintiffs,

Civ. Action No. 03 CV 5071 (RCC)

- against -

AL QAEDA ISLAMIC ARMY, et al.,

Defendants.

-----X

JOHN P. O'NEILL, JR., et al.

Plaintiffs,

Civ. Action No. 03 CV 1076 (RCC)

- against -

THE REPUBLIC OF IRAQ, et al.,

Defendants.

-----X  
ESTATE OF JOHN P. O'NEILL, SR.

Plaintiffs,

Civ. Action No. 03 CV 1923

- against -

AL BARAKA INVESTMENT &  
DEVELOPMENT CORP., et al.

Defendants.

-----X  
ESTATE OF JOHN P. O'NEILL, SR.

Plaintiffs,

Civ. Action No. 03 CV 1922

- against -

KINGDOM OF SAUDI ARABIA et al

Defendants.

-----X

-----X  
FEDERAL INSURANCE CO., et al.

Plaintiffs

Civ. Action No. 03 CV 6978 (RCC)

- against -

AL QAIDA

Defendants.

-----X

THOMAS BURNETT, Sr.et al.

Plaintiffs,

Civ. Action No. 03 CV 5738

- against

AL BARAKA INVESTMENT &  
DEVELOPMENT CORP., et al.

Defendants.

-----X

BARRERA et al.

Plaintiffs,

Civ. Action No. 03 CV 7036

- against -

AL QAEDA ISLAMIC ARMY et al.

Defendants.

-----X

**Schedule B: Attorneys to be served electronically**

## Plaintiffs' Counsel (June 15, 2004)

### 03 MDL 1570 SERVICE LIST

*In re: Terrorist Attack on September 11, 2001, 03 MD 1570 (Judge Richard Casey),  
U.S. District Court for the Southern District of New York*

<b>Plaintiffs' Counsel</b>	<b>Underlying Case Name</b>
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<b>BARASCH McGARRY SALZMAN PENSON &amp; LIM</b> 11 Park Place New York, NY 10007 Tel: (212) 385-8000 Fax: (212) 385-7845  Michael Barasch, Esquire michael@personalinjuryjustice.com	<b>Ashton, et al. v. Al Qaeda, et al.</b>
<b>BARTIMUS, FRICKLETON, ROBERTSON &amp; OBETZ</b> 200 Madison Avenue, Suite 1000 Jefferson City, MO 65101 Tel: (573) 659-4454 Fax: (573) 659-4460  Edward D. Robertson, Esquire chiprob@earthlink.net  Mary Winter, Esquire marywinter@earthlink.net	<b>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</b>
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<b>DAVIS, SAPERSTEIN &amp; SALOMON, P.C.</b> 375 Cedar Lane Teaneck, NJ 07666 Tel: (201) 907-5000 Fax: (201) 692-0444  Samuel L. Davis, Esquire sam@dsslaw.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
<b>EPSTEIN BECKER &amp; GREEN, P.C.</b> 250 Park Avenue New York, NY 10177-1211 Tel: (212) 351-4500 Fax: (212) 661-0989  Clare M. Sproule, Esquire csproule@ebglaw.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
<b>GAIR, GAIR, CONASON, STEIGMAN &amp; MACKAUF</b> 80 Pine Street New York, NY 10005 Tel: (212) 943-1090 Fax: (212) 425-7513  Robert Conason, Esquire rconason@gairgair.com  Howard Hershenhorn, Esquire hsh@gairgair.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
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<b>HOWARTH &amp; SMITH</b> 800 Wilshire Boulevard, Suite 750 Los Angeles, CA 90017 Tel: (213) 955-9400 Fax: (213) 622-0791  Robert D. Brain, Esquire Don Howarth, Esquire Suzelle M. Smith, Esquire  MDL1570@howarth-smith.com	<b>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</b>  <b>Havlish, et al. v. Bin Laden, et al.</b>
<b>THE HUGE LAW FIRM PLLC</b> 7 <sup>th</sup> Floor 1001 Pennsylvania Avenue, NW Washington, DC 20004 Tel: (843) 722-1628 Fax: (202) 318-1261  Harry Huge, Esquire harryhuge@comcast.net	<b>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</b>
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<b>JUDICIAL WATCH, INC.</b> 501 School Street, SW, Suite 725 Washington, DC 20024 Tel: (202) 646-5175 Fax: (202) 646-5199  Paul J. Orfanedes, Esquire James F. Peterson, Esquire  jpeterson@judicialwatch.org	<b>Burnett v. Al Baraka Inv. and Dev. Corp., et al.</b>
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## Defendants' Counsel (June 8, 2004)

### 03 MDL 1570 SERVICE LIST

*In re: Terrorist Attack on September 11, 2001, 03 MD 1570 (Judge Richard Casey),  
U.S. District Court for the Southern District of New York*

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